

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JAMES ADAMS, et al.,

Plaintiffs,

v.

GUILLERMO GHARIB, et al.,

Defendants.

Case No. 1:24-cv-9378-LAK-OTW

NOTICE OF DEFENDANT CYRUS ABRAHIM'S MOTION TO DISMISS

PLEASE TAKE NOTICE that upon the accompanying Declaration of Cyrus Abraham, the accompanying Declaration of John W. Brewer with the exhibits thereto, and the accompanying Memorandum of Law, Defendant Cyrus Abraham will move this Court, on a return date to be determined by the Court, at the United States Courthouse, 500 Pearl Street, New York, New York, for entry of an order dismissing this action as against him for improper venue, lack of jurisdiction, and/or invalid service of process, pursuant to Federal Rule of Civil Procedure 12(b)(2), (3) & (5); and

PLEASE TAKE FURTHER NOTICE that opposing papers, if any, must be served upon the undersigned within the time provided for in Local Civil Rule 6.1(b).

Dated: New York, New York
June 20, 2025

AMINI LLC

By: /s/ John W. Brewer
John W. Brewer
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Attorneys for Defendant Cyrus Abraham¹

TO:

Plaintiffs' Counsel of Record (via ECF/PACER)

¹ Notice is hereby given that this firm's representation of Mr. Abraham in this matter is limited to this initial Motion as per N.Y. Rule of Professional Conduct 1.2(c).